

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS**

STUDENTS AND PARENTS FOR
PRIVACY, a voluntary unincorporated
association; C.A., a minor, by and through her
parent and guardian, N.A.; A.M, a minor, by
and through her parents and guardians, S.M.
and R.M.; N.G., a minor, by and through her
parent and guardian, R.G.; A.V., a minor, by
and through her parents and guardians, T.V.
and A.T.V.; and B.W., a minor, by and
through his parents and guardians, D.W. and
V.W.,

Plaintiffs,

v.

UNITED STATES DEPARTMENT OF
EDUCATION; JOHN B. KING, JR., in his
official capacity as United States Secretary of
Education; UNITED STATES
DEPARTMENT OF JUSTICE; LORETTA E.
LYNCH, in her official capacity as United
States Attorney General; and SCHOOL
DIRECTORS OF TOWNSHIP HIGH
SCHOOL DISTRICT 211, COUNTY OF
COOK AND STATE OF ILLINOIS,

Defendants.

NOTICE OF MOTION

PLEASE TAKE NOTICE that on Tuesday, May 31, 2016 at 9:30 a.m. or as soon thereafter as counsel may be heard, the undersigned counsel will appear before the Honorable Jorge L. Alonso, or any judge sitting in his stead, in Room 1219 of the Everett McKinley Dirksen Building, 219 South Dearborn Street, Chicago, Illinois, and present the Motion to Intervene as Defendants of Students A, B, and C, By and Through Their Parents and Legal Guardians, and of the Illinois Safe Schools Alliance.

Dated: May 25, 2016

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** application for pro hac vice admission
forthcoming*

Respectfully submitted,

/s/ Britt M. Miller
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Counsel for Students A, B, and C, and the Illinois Safe Schools Alliance

CERTIFICATE OF SERVICE

I, Britt M. Miller, an attorney, hereby certify that on May 25, 2016, I caused a true and correct copy of the foregoing **NOTICE OF MOTION** as well as the **MOTION TO INTERVENE AS DEFENDANTS OF STUDENTS A, B, AND C, BY AND THROUGH THEIR PARENTS AND LEGAL GUARDIANS, AND OF THE ILLINOIS SAFE SCHOOLS ALLIANCE** and the **MEMORANDUM OF LAW IN SUPPORT OF MOTION TO INTERVENE AS DEFENDANTS OF STUDENTS A, B, C, BY AND THROUGH THEIR PARENTS AND LEGAL GUARDIANS, AND OF THE ILLINOIS SAFE SCHOOLS ALLIANCE**, to be filed and served electronically via the court's CM/ECF system. Notice of this filing will be sent by e-mail to all parties by operation of the court's electronic filing system or by mail to anyone unable to accept electronic filing as indicated on the Notice of Electronic Filing. Parties may access this filing through the court's CM/ECF System.

/s/ Britt M. Miller

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